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4 Attorney for Debtor(s) Wendy Graves

5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF CALIFORNIA
7 SACRAMENTO

8 In re:

9 Wendy Graves
XXX-XX-6877

Case No. 10-26083

DC No.: SNM-1
DATE: APRIL 12, 2010
TIME: 9:00 A.M.
DEPT#: A - COURTROOM 28
HONORABLE JUDGE MCMANUS

12 Debtor.

13 **MOTION FOR AN ORDER APPROVING ABANDONMENT OF**
14 **CERTIFIED REPORTING SERVICES (A SOLE PROPRIETORSHIP)**

15 TO THE HONORABLE BANKRUPTCY JUDGE,

16 The Motion of Wendy Graves respectfully represents:

- 17 1. Movant filed a voluntary petition for relief under Title 11 of the United States
code on March 11, 2010.
- 18 2. At the time of the entry of the order for relief debtor was in possession of the
19 following described property: Certified Reporting Services (a sole
20 proprietorship), located at 801 East 2nd St, Suite 102, Benicia, CA 94510, and
101 Lucas Valley Rd, Suite 160, San Rafael, CA 94901, consisting of personal
21 property described on Schedule B and as more particularly described on
debtor's declaration filed herewith.
- 22 3. The property so described is claimed as exempt by the debtor under CCP
703.140(b)(6) and CCP 703.140(b)(5) and no administration by the trustee is

23 contemplated.

- 24 4. Movants desire to continue to operate said business during the pending of the
25 bankruptcy proceeding and require an order of abandonment under Bankruptcy
26 Rule 6007.

27 WHEREFORE, Movant prays that the trustee in the above-stated case be required to
28 abandon said personal property and for such other and further relief as is just and proper.

29 Dated: March 13, 2010

30 /s/ Stephen Murphy
31 STEPHEN MURPHY
32 Attorney for Movant
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